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9 **UNITED STATES DISTRICT COURT**

10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11 NEELAM SANDHU, an individual,  
12 Plaintiff,  
13 vs.  
14 BLACKBERRY CORPORATION, a  
15 Delaware Corporation,  
16 Defendant.

Case No. 3:24-cv-02002-SK

**DECLARATION OF LAUREN N. BECK  
REGARDING EXHIBITS TO DKT. NO.  
111**

Judge: Hon. Sallie Kim

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Case No. 3:24-cv-02002-SK

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DECLARATION OF LAUREN BECK REGARDING EXHIBITS TO DKT. NO. 111

**DECLARATION OF LAUREN N. BECK**

I, Lauren N. Beck, hereby declare:

1. I am admitted to practice law in the State of California and before this Court. I am an attorney at Munger, Tolles & Olson LLP, and represent Defendant BlackBerry Corporation in this action. I submit this declaration regarding exhibits filed at Dkt. No. 111 in this litigation. The contents of this declaration are based on my personal knowledge, including my personal knowledge of the documents cited herein. The facts set forth herein are within my personal knowledge and, if called as a witness, I could and would competently testify to them.

9       2.      On December 10, 2025, Defendant BlackBerry Corporation filed a Motion for  
10     Summary Judgment (Dkt. No. 111). In support of the motion, BlackBerry filed a Declaration of  
11     Lauren Beck (“Beck Declaration”), Dkt. No. 111-4, which attached exhibits to the Motion for  
12     Summary Judgment at Dkt. Nos. 111-5 through 111-52.

13       3. After filing the motion, BlackBerry discovered that it had inadvertently failed to  
14 file one exhibit, Exhibit 7 to the Beck Declaration. BlackBerry attempted to file Exhibit 7 on  
15 December 11, 2025, at Dkt. No. 114, but received a filing error. A copy of **Exhibit 7** to the Beck  
16 Declaration is now attached to this declaration.

17       4.       After filing the motion, BlackBerry also discovered that five exhibits attached to  
18 the Beck Declaration—Ex. 3 (Dkt. 111-7), Ex. 9 (Dkt. 111-12), Ex. 30 (Dkt. 111-33), Ex. 31 (Dkt.  
19 111-34), and Ex. 34 (Dkt. 111-37)—contained material that was inadvertently filed publicly,  
20 rather than under seal, and which implicates privacy interests of third parties. BlackBerry called  
21 the ECF helpdesk, which promptly locked the exhibits. BlackBerry then filed a Motion to Lock  
22 Improperly Filed Documents (Dkt. No. 115), requesting that the Court seal the five docket entries  
23 in question.

24       5. Attached to this declaration are revised and corrected Public-Redacted versions of  
25 those exhibits—**Exhibit 3** (originally Dkt. 111-7), **Exhibit 9** (originally Dkt. 111-12), **Exhibit 30**  
26 (originally Dkt. 111-33), **Exhibit 31** (originally Dkt. 111-34), and **Exhibit 34** (originally Dkt. 111-  
27 37). BlackBerry has added redactions to these exhibits to address material that was inadvertently  
28 filed publicly and that implicates the privacy interests of non-parties to this suit.

1       6.      On December 12, counsel for Plaintiff informed me that **Exhibit 3** (filed at Dkt.  
2 111-7), which contains excerpts of the transcript of the August 22, 2025 deposition of Neelam  
3 Sandhu, omitted the court reporter's certification page. The corrected Exhibit 3 therefore adds the  
4 inadvertently omitted reporter certification page. No further changes have been made to the  
5 content of Exhibit 3.

6       7.     Except for the changes described above, no changes have been made to the content  
7 of any of the exhibits attached to this declaration.

9 I declare under penalty of perjury under the laws of the United States that the foregoing is  
10 true and correct. Executed on this 12th day of December, 2025, at Los Angeles, California.

12 DATED: December 12, 2025

By: /s/ Lauren N. Beck

Lauren N. Beck